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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AJW PARTNERS, LLC, AJW OFFSHORE, LTD,
AJW QUALIFIED PARTNERS, LLC, and NEW
MILLENNIUM CAPITAL PARTNERS II, LLC,

Plaintiffs,

-against-

CYBERLUX CORPORATION and
DONALD F. EVANS,

Defendants.

Case No. 07-CV-8367

ECF CASE

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Corey Ribotsky, dated February 29, 2008, the annexed Declaration of Thomas J. Fleming, dated March 6, 2008, the exhibits thereto, the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction, and the Summons and Complaint, the undersigned attorneys for plaintiffs AJW Partners, LLC, AJW Offshore, Ltd., AJW Qualified Partners, LLC, and New Millennium Capital Partners II, LLC, shall move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 10007-1312, at a time and date to be designated by the Court for:

A. A preliminary injunction, pursuant to Rule 65, Fed. R. Civ. P., directing defendant Cyberlux Corporation to deliver to plaintiffs forthwith 23,563,213 shares of

defendant's common stock in accordance with the Callable Secured Convertible Notes issued to it by plaintiffs (the "Notes") and the Notices of Conversion, dated August 10, 2007, providing that upon any sale of all or portion of these shares, the proceeds shall be held in escrow pending the final adjudication of the case;

B. A preliminary injunction, pursuant to Rule 65, Fed. R. Civ. P., directing defendant Cyberlux Corporation to deliver to plaintiffs forthwith 3,000,000 shares of defendant's common stock in accordance with the Notes and the Notices of Conversion, dated February 7, 2008, providing that upon any sale of all or portion of these shares, the proceeds shall be held in escrow pending the final adjudication of the case; and

C. An order granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6.1(b) of the Local Civil Rules of the United States District Court for the Southern District of New York, opposing papers, if any, must be served within ten (10) business days after service of these papers.

Dated: New York, New York
March 6, 2008

OLSHAN GRUNDMAN FROME
ROSENZWEIG & WOLOSKY LLP

By: /s/ Thomas J. Fleming
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